

Dr. Orly Taitz, ESQ  
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Pro se plaintiff

**IN THE US DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

DR. ORLY TAITZ, ESQ

**Plaintiff,**

VS.

KATHLEEN SEBELIUS,  
In her capacity of Secretary of  
Health and Human Services et.al.

**Defendant.**

) Case No.: 3:12-cv-03251-P  
)  
) VIOLATION OF 14<sup>TH</sup> AMENDMENT  
) EQUAL PROTECTION RIGHTS,  
) ESTABLISHMENT CLAUSE  
) ARTICLE 2 SEC 1 OF COSTITUTION  
) INJUNCTIVE RELIEF, STAY  
) DECLARATORY RELIEF  
) RICO, PREDECATE CRIMES:  
) FRAUD, AIDING AND ABETTING  
) FORGERY AND UTTERING OF  
) FORGED DOCUMENTS TO  
) COMMIT ELECTIONS FRAUD  
  
7TH AMENDMENT JURY  
DEMANDED

## **REPLY TO ORDER TO JUSTIFY VENUE**

## BACKGROUND

1 The case Taitz v Sebelius et. al was originally filed in the U.S. District Court  
2 Central District of California on July5, 2012. The complaint Challenges the  
3 constitutionality of the Patient Protection and Affordable Act 26 USC 5000A. On  
4 August 16, 2012 the District Judge Dolly M. Gee dismissed the case without  
5 prejudice for lack of venue. Plaintiff re-filed the Complaint in Northern District of  
6 Texas due to the fact that one of the non-federal defendants William Chatfield  
7 resides in Northern District of Texas, Dallas Division.

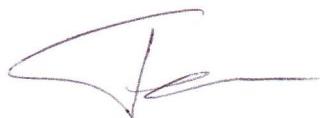
### 13                   **Argument**

14 In her decision from August 16, 2012, the District Judge Gee ordered to dismiss  
15 the Complaint without prejudice for lack of venue on the basis that none of the any  
16 non-federal defendant reside in the Central District of California.

17 28 U.S.C. § 1391(e)(1)(C) states that Non-federal defendants may be joined in  
18 such a civil action if the plaintiff demonstrates that venue is proper for such non-  
19 federal defendants under “other venue requirements as would be applicable if the  
20 United States or one of its officers, employees, or agencies were not a party.”In her  
21 decision, Judge Gee pointed that Defendant William Chatfield is a non-federal  
22 defendant and does not reside in CA, Exhibit 1 Ruling by Judge Gee. Due to the  
23 fact that defendant Chatfield resides in the Northern District of TX, Plaintiff Taitz  
24

properly re-filed the case in the Northern District of TX. The venue is proper. As  
the complaint was originally filed on July 5<sup>th</sup> and all the parties were served on  
July 5, 2012, and current complaint was refilled in order to change venue, Taitz is  
requesting an expedited Motion hearing on her motion to stay Healthcare penalties/  
Healthcare tax, which was originally scheduled in CA on August 10<sup>th</sup> and had to be  
rescheduled. This case has national importance and expedited hearing is warranted.

Respectfully submitted



/s/ Dr. Orly Taitz ESQ  
08.31.2012

### **Proof of Service**

I, Yulia Yun, over 18 years old and not a party to this case, declare under penalty of perjury that I served the copy of the above pleadings on the parties by sending a true and correct copy of the above documents in by the US mail at the addresses below:

Kathleen Sebelius  
Via the Office of the U.S. District Attorney  
For Northern District of Texas  
1100 Commerce st. 3<sup>rd</sup> floor  
Dallas, TX 75242

Barack Hussein Obama  
Via the Office of the U.S. District Attorney  
For Northern District of Texas  
1100 Commerce st. 3<sup>rd</sup> floor  
Dallas, TX 75242

Michael Astrue  
Via the Office of the U.S. District Attorney  
For Northern District of Texas  
1100 Commerce st. 3<sup>rd</sup> floor  
Dallas, TX 75242

Eric Holder  
Via the Office of the U.S. District Attorney  
For Northern District of Texas  
1100 Commerce st. 3<sup>rd</sup> floor  
Dallas, TX 75242

William Chatfield  
1517 Bonham CT  
Irving, TX 75038

Nancy Pelosi  
Democratic Party Headquarters  
430 South Capitol St. SE  
Washington DC, 20003

Brian Schatz  
1050 Ala Monana Blvd. #2660  
Honolulu, HI 96814

Lynne Matusow

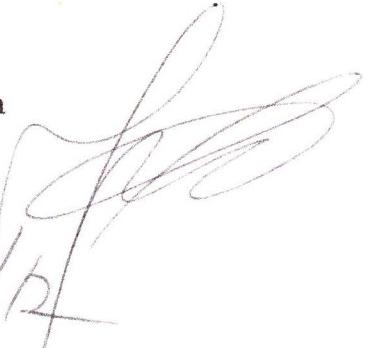
1050 Ala Monana Blvd. #2660  
Honolulu, HI 96814

Alvin Onaka  
Via the Department of Attorney General  
425 Queen Street  
Honolulu, HI 96813

Alice Travis Germond  
Democratic Party Headquarters  
430 South Capitol St. SE  
Washington DC, 20003

“Obama for America”  
P.O. Box 803638,  
Chicago, IL, 60680

Yulia Yun

  
A handwritten signature in black ink, appearing to read "Yulia Yun".

08/31/12